

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(5) JAIME RENTERIA-FERNANDEZ,

Defendant.

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SEALED

CRIMINAL NO. EP-21-CR-00725-DB

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant is charged with violations of the Controlled Substances Act which carry a term of imprisonment of over ten (10) years.
2. The Defendant has been charged by Indictment with violations of Title 21, United States Code, Sections 963 and 952(a), *Conspiracy to Import a Controlled Substance*; Title 21, United States Code, Sections 846 and 841(a)(1), *Conspiracy to Possess a Controlled Substance*; Title 21, United States Code, Sections 963, 959(a) and 960, *Conspiracy to Manufacture/Distribute a Controlled Substance for the Purpose of Unlawful Importation*; Title 18, United States Code, Sections 924(o) and 924(c), *Conspiracy to Use and Carrying of Firearms During and in Relation to a Drug Trafficking Crime*; Title 18, United States Code, Sections 924(j) and 2, *Murder Resulting From the Use and Carrying of Firearms During and in Relation to a Drug Trafficking Crime, and Aiding and Abetting*; Title 18, Sections 924(c) and 2, *Use and Carrying of Firearm During and in*

Relation to a Drug Trafficking Crime and Aiding and Abetting; Title 21, Sections 952(a) and 2, Importation of a Controlled Substance and Aiding and Abetting; Title 21, Section 841(a)(1) and Title 18 Section 2, Importation of a Controlled Substance and Aiding and Abetting; and Title 18, Section 1956(h), Conspiracy to Launder Monetary Instruments.

3. The Defendant is a United States Citizen, however has strong ties to Mexico, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.

4. There are no conditions or combination of conditions which will reasonably assure the appearance of Defendant at future court settings.

5. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.

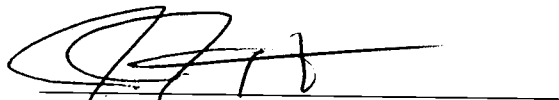
The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

ASHLEY C. HOFF
UNITED STATES ATTORNEY

By:



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